

Region 1 – Goal 2

EPA Region 1-New England Office: State and Tribal Issue/Priorities for the EPA Strategic Plan, Goal 2 Clean and Healthy Water

1. How information was gathered. This information was gathered from reviewing and discussing the New England State Commissioners' comments on the Office of Water's 2006 Program Guidance and from a recent conference call with our states and HQ. We also based this summary on our performance partnership negotiations/discussions, as well as specific programmatic meetings held between the Region and our states. Lastly, a direct solicitation for state comments was made to each State Planning/PPA Staff lead.

Over the last two years, Region 1 Tribes have developed a regional tribal strategic plan. The Tribal priorities listed below were pulled from the strategic plan as well as more recent information that was gathered from the Tribes by the Region 1 TOC representative.

2. Description of key state issues/priorities.

Lack of Adequate EPA Funding to Cover Increased Reporting Burden: The biggest, overarching issue for our states is inadequate EPA funding. The states believe that the increasing number of new requirements and additional reporting is not commensurate with the level of EPA funding. In developing the revised strategic plan, EPA should not increase the number of outcome or output measures. EPA should try to consolidate and reduce the reporting burden on the states. For example, EPA should ensure PART measures, PAMs, and strategic outcome measures are aligned and coordinated to minimize the burden on our states.

Drinking Water Programs: Safe Drinking Water Act programmatic funding for states and EPA technical assistance has remained essentially level, while the workload has significantly increased with a significant influx of new rules. EPA should re-evaluate the pace and implementation schedule of these new rules if it is unable to provide states and regions more resources to implement them. Without more resources, it is questionable whether existing results can be maintained and new requirements can be met. These issues would have direct relevance to Sub-objective 2.1.1 and, if not addressed, may require lowering strategic targets.

Monitoring: The New England States have some concerns related to monitoring. First, the states believe that increased funding is essential to implement comprehensive monitoring strategies and support 106 supplemental funds for monitoring. EPA should continue to work closely with the states to determine the 106 funding formula for the base and increases for monitoring, especially if it is to be directed to supporting national probabilistic monitoring programs. The states are concerned that there will not be any funds left over to support their strategies if all the funds go towards the national monitoring program. Lastly, states would like continued regional and HQ technical

support for STORET and the assessment database (ADB), especially prior to EPA making these data systems binding requirements. The states support speedy development and implementation of the CDX to facilitate STORET data uploading. Although monitoring supports all Strategic Targets for goal 2, this issue is primarily addressed in the means and strategies section and in the resulting annual PAMs.

TMDLs: The New England states have insufficient resources to complete all TMDLs within a 13-year time frame. Furthermore, our states would like formal credit (e.g., in determining annual TMDL targets, in funding allocations, etc.) for implementing TMDLs and other water quality control strategies (category 4(b) control measures). EPA should look for new measures to give credit for water quality control plans and implementation activities, in addition to providing technical and monetary assistance for TMDL development. The issue of EP&M assistance to states needs to be resolved. The program activity measures and targets should be examined holistically to more effectively link the water quality program to our strategic goals and Objective 2.2.

Integrated Report Guidance [303(d) & 305(b)]: States believe that the integrated report guidance requires further amendment because it requires not only the list, but also many of the previous reporting elements. States have also historically had issues with 4(b) off-ramping portions of the guidance. Although HQ has made some changes to this portion of the guidance, states believe the approval threshold for 4(b) remains too high. When measuring performance, states would like EPA to give credit for completing TMDLs as well as moving water bodies into category 4(b). This would have direct relevance to the Strategic Targets we set under Objective 2.2.

NPDES: The guidance requires that states and EPA maintain an NPDES backlog of 10% for all sources and a 5% backlog for environmentally significant sources. The states will not be able to achieve the 10% goal under any circumstances. Furthermore, states believe that the 10% overall backlog target impedes progress on the more important target for environmentally significant permits. States would also like to see more flexibility in the definition of priority permits (e.g., to include important permit modifications for nutrients, etc.). This issue could effect Strategic Targets in Objective 2.2 but may be more relevant for the Means and Strategies section and the resulting annual PAMs.

Nonpoint Source (NPS) and Watershed Program Activity Measures: Our states have identified issues with some of the nonpoint source measures in the national guidance. One of the measures asks for the # of water bodies identified by states as being primarily NPS-impaired that are partially or fully restored. The states believe that this is not a good measure since it will take a long time to demonstrate actual progress. Another measure requests the number and dollar value of nonpoint source projects financed with clean water SRF loans. The states believe that there is currently not enough funding. States believe that some of the watershed planning measures define the bar too high (e.g., # of watershed plans substantially complete), and consequently we will not be able to show much progress. Lastly, states feel strongly that improvements to the GRTS tracking system (e.g., immediate upgrade to the server and

timely transition to the Oracle-based system) are necessary to effectively track progress in the nonpoint source program. This issue is directly relevant to the Strategic Targets in Objective 2.2, and Sub-Objective 2.2.1.

3. Description of key EPA New England issues.

Overall, EPA New England agrees with the state issues listed above. We have three additional issues for your consideration.

Watershed Outcome Measures: Our states have not focused much on the watershed outcome measures (2.2.1.a and b, measure L). As you know the watershed outcome measures use an 8-digit HUC scale which is too large. We will not be able to demonstrate much progress for the foreseeable future. In addition, HQ is asking the regions and states to increase their efforts to show progress on a water body (segment) scale but there are no additional resources to support this effort. States will not be able to commit to an increased effort on watersheds without a disinvestment elsewhere. If we are able to make any progress, it will be modest at best over the next several years. Region 1 believes that we should re-evaluate the watershed outcome measures and measure L to design measures that show incremental progress (such as partial restoration). In addition, EPA should consider using an alternative measure or indicator in lieu of measure 2.2.1a and b.

Pollution Prevention: A key issue raised by states is the need to integrate pollution prevention (P2) throughout all of EPA's programs, and not just have it be the responsibility of one or two offices. To accomplish this, we recommend that P2 be explicitly addressed as appropriate in each of the Strategic Plan Goals. In addition, or alternatively, P2 could be made a Cross-Goal Strategy. In either case, it is critical that pollution prevention become part of program offices' objectives and be realized through quantifiable targets as much as possible.

Wetlands and Oceans: EPA New England suggests that the strategic plan consolidate all water objectives and subobjectives into Goal 2 as opposed to splitting them between Goals 2 and 4. In the region, we coordinate planning and implementation of the water programs as a whole. It may be more efficient to consolidate all water subobjectives in Goal 2.

4. Description of key Tribal priorities.

- **Monitoring:** Monitoring and data gathering and analysis, including contamination of subsistence foods and traditional medicines from water quality problems.
- **Nonpoint Source Pollution:** Education and outreach to tribal members and partners and best management practices to control and reduce nonpoint source pollution.

- **Wetlands:** Delineation, monitoring, protection and remediation.
- **Point Source pollution:** Water quality standards, TMDLs, NPDES permits.

Addressing these Tribal issues could require revision of Strategic Targets for Objectives 2.1 and 2.2 and potentially adding more tribal specific language to the means and strategies section.

Region 2 – Goal 2

Region 2 State and Tribal Input to EPA Strategic Plan

Goal 2

How information was gathered:

Region 2's Regional Administrator solicited comments from the State environmental commissioners in New Jersey, New York, Puerto Rico and the Virgin Islands and from the leaders of the seven federally recognized tribes in New York State. States and tribes were provided background information on EPA's revision of its Strategic Plan and were asked a series of questions designed to elicit comments, by goal, on their priorities, emerging issues, priorities that should be added or deleted from the Agency's plan, and any other advice they might have for the Goal Teams. Additionally, all of our staff that interact with their state/tribal counterparts (such as our Tribal coordinator, NEPPS and PPG coordinators, enforcement coordinators, etc.) were encouraged to solicit feedback regarding the Agency's strategic plan revision. We also committed to engage in an ongoing dialogue about priorities with our state and tribal partners, both as the Agency's strategic plan revision proceeds and when we revise our regional strategic plan next year. We received comments from the New York State Department of Environmental Conservation (NYSDEC), the Puerto Rico Environmental Quality Board (PREQB), the Virgin Islands Department of Planning and Natural Resources (VIDPNR) and the Haudenosaunee Environmental Task Force (HETF), representing the Onondaga Nation (the HETF comments were also endorsed by the Tuscarora Nation).

General Comments on EPA Strategic Plan:

NY stated that the current targets in the current EPA plan at least generally have quantifiable measures for performance that are associated with goals the public can understand. NY suggests that in light of increasingly tight funding, the priority for more cost effective investment in recognizing and providing incentives for sustainable businesses going beyond minimum compliance, pollution prevention and product stewardship should be part of retooling the base regulatory programs, not just an add-on with no funding (i.e. a separate Goal 5.) This is fundamental to the architecture of the 5 goals. The regulatory flexibility necessary to achieve these gains is not evident in the policies of OECA, EPA funding rules nor even the targets established for the media programs in the plan. Current incentives and self-audit policies are also weak, at best. Alignment across EPA offices to support strategic plan goals is critical, otherwise states perceive EPA as speaking with too many different voices on strategic priorities.

Regarding implementation of the strategic plan, NY states that while the states do the majority of work in implementing the goals of the plan, EPA funding to states continues to be cut or unavailable, for example water and wastewater infrastructure, the Resource Conservation Challenge (RCC) initiative, pollution prevention. Fiscal realities undermine the credibility of the commitments made within the strategic plan. Unilateral rescission of grant funding to states, absent a dialogue, is not an approach consistent with the partnership commitments made in the plan.

NY states that EPA has not taken leadership on targets for which a federal lead is most critical because they affect national markets or global transport considerations (e.g. global warming, mercury, electronics waste). This further erodes the credibility of strategic commitments in the plan. These credibility issues ultimately affect the extent to which states will choose to comment on or participate in the strategic planning efforts. NY mentions concern regarding the unknown effects of nanotechnology product expansion in the environment (can affect several goals across media).

The HETF commented that the Strategic Plan should reflect Administrator Johnson's reaffirmation of government-to-government relationships with Nations in the agency Overview and throughout all Goals. Additionally, HETF suggested that EPA should recognize the jurisdiction and interests of the respective Indian Nations in aboriginal territory (i.e., land claim areas). Other comments from HETF are that tribal grants should limit the required matching funds and should provide flexibility to reallocate grant monies to better meet needs; EPA's budget solicitations should include Tribal Consortia (e.g., HETF); and there needs to be better turnaround time by EPA on award notice and money drawdown.

Data concerns arose such as PREQB's suggestion that EPA establish partnerships with local authorities to develop and distribute updated and comprehensive maps on all sources of water and environmental resources in Puerto Rico, for example: Groundwater wells, Surface Water Intakes, Fisheries and Threatened and Endangered Species by geographical area. (Note this is a national issue as GIS data acquisition is done centrally by the Agency).

Regarding energy, NYSDEC states that EPA's current five-goal architecture does not readily provide for energy considerations as a major goal. The quest for renewable energy resources under the Governor's Renewable Portfolio Standard, the expansion of the Green Building Tax Credit Program, the recognition of energy savings accomplishments in the New York Environmental Excellence Awards and Environmental Leaders programs, DEC's role in NYS energy planning and energy security are all priorities relevant to energy which have direct implications for resource consumption, pollution and homeland security. Notwithstanding scattered references to energy conservation, the energy issue has too many environmental implications to be largely deferred to other federal and state energy agencies. The Puerto Rico Environmental Quality Board also suggests that EPA address issues associated with investigating and developing new sources of energy. The Virgin Islands also comments that there is limited focus on energy. Energy conservation should be of higher priority.

The Virgin Islands DPNR finds EPA's current five-goal architecture adequate to capture priorities with the caveat that sufficient support is available on Caribbean issues. VIDPNR commented that global warming and energy conservation are its highest priority issues. Also, it is important to include the Virgin Islands in national programs such as EMAP and Global Change (where they currently are not reflected).

Comments Specific to Goal 2:

NYSDEC comments that the recommendations of the Pew Commission Oceans study was an extensive multi-year effort that illustrates the crisis state of these resources and probably warrants its own Goal area. Absent this, the content of those recommendations should be reflected in an update to Goal 2 targets and strategies.

NYSDEC states that the continued quest for TMDLs under Goal 2 re: Clean Water probably needs to be revisited as shrinking resources may need to be concentrated on actual waste minimization rather than what are becoming very costly and lengthy efforts to model and determine appropriate TMDLs for each constituent in each water body.

VIDPNR recommends that Goal 2 support capacity building at the local level for monitoring the effects of long-term water quality changing conditions on marine communities. Of particular interest are coral reef, mangroves and sea grass beds. There is a need to develop regulations for ballast water discharges from large ships, fueling activities and hull cleaning and maintenance activities. Additionally, there is a need to develop field/in vivo analytic methods for measuring contaminant levels in surface waters.

The impacts of global environmental issues seem to be accelerating in the Virgin Islands. The global warming trend and the impacts of: African dust from the Sahara are of most concern. African dust contributes to health (respiratory) and coral reef decline in the Virgin Islands. Agricultural toxins are also traveling to the Territory with the dust. Other impacts from global warming include dieoffs of coral tissue from elevated sea temperature. Summer 2005 has seen massive coral bleaching events throughout the entire Virgin Islands. This may lead to massive mortality in the near future. There is also a more active hurricane season that is believed to be caused by global warming trends. The Virgin Islands has had many severe hurricanes over the years. Increasing activity and threats are very worrisome, as is the concern about sea level rise. Though none is observed at present, this would have severe impacts in the Virgin Islands as it is a coastal community.

Region 3 – Goal 2

Region 3, Goal 2: State Regional Issue/Priority Paper

1. Information Gathering: Region 3 hosted a multi-state conference call on September 13, 2005 to discuss overall priorities and met with each Region 3 division director. In addition, state issues and priorities were solicited during the year through bi-annual meetings with State Secretaries in the Fall and Spring and through EPA/state planning meetings. Information is gathered within the media specific programs in several different ways such as: 1) bi-annual State Directors meetings; 2) issue specific conference calls, 3) Performance Partnership Agreements, and 4) grants mid and end-of-year reviews.

2. Description of Key State Issues/Priorities (Most prevalent among states)

- Water Supply Capacity: issue focuses on whether the states have an adequate quantity of water and protecting and enhancing water quality for current and future supply sources.
- Non-Point Source: broad category that includes how to effectively regulate non-point sources such as: agricultural runoff, Combined Animal Feeding Operations (CAFOs); and acid mine drainage.
- Wet Weather: understanding impact of wet weather on Combined Sewer Overflows (CSOs)/Storm Sewer Overflows (SSOs) in an era of increasing amounts of impervious surfaces.
- Water Sustainability, Preparedness and Security: ensuring that there is a prepared and responsive water and sewer service capacity and sustainable infrastructure; wastewater side of security often overlooked.

Comments on Strategic Plan Architecture:

- Change title of Objective 2.2- Protect Water Quality to Watershed Restoration.
- Add following subobjectives to Objective 2.1 (and perhaps 2.2):
 - “Maintain Infrastructure and Services”: would focus on the drinking water and sewer preparedness, security and infrastructure sustainability issues;
 - “Protect Ground Water Sources of Drinking Water”: would centralize groundwater protection issues which are buried, fragmented and spread throughout the current architecture; surface water sources are treated more extensively and comprehensively;
 - “Unregulated Contaminant Response”: would cover many emerging threats to drinking water sources, e.g. pathogens, pharmaceuticals and personal care products, MTBE, perchlorate, radon, etc.
- Move objective 4.3- Ecosystems to Goal 2. Specifically move estuaries (4.3.1) and wetlands (4.3.2) to 2.2.1- Improve Water Quality on a Watershed Basis. These programs are vital to the restoration of watersheds and having them separate in the architecture does not reinforce that idea. The subobjectives

pertaining to Great Lakes (4.3.3), Chesapeake Bay (4.3.4), and Gulf of Mexico (4.3.5) could be moved to Goal 2 as their own separate subobjectives.

- Radiation protection program: radon in drinking water should be highlighted in Goals 1 and 2.
- Currently, Goal 2 (mainly the Office of Water) and Goal 5 (mainly the Office of Enforcement and Compliance Assistance) subobjectives, targets, and measures do not support or complement one another. There needs to be some common language in Goal 2 and Goal 5.

Region 4 – Goal 4

Region 4 Goal 2 Regional State and Tribal Issue/Priority Paper

How information was gathered

The Region sent a letter to our State Commissioners and Tribal Chiefs requesting their input on the Strategic Plan and their program priorities. In addition, individual meetings were held with our states Water program managers to discuss ways of achieving Goal 2, Clean and Safe Water. We also held teleconferences with states and reviewed State strategic plans and documents. This subject has also been discussed at several State Water Division Director meetings with the Region. Finally, it has been a subject of both 106 Grant Workplans and PPA revisions in the Region.

Description of key state issues/priorities

- Our states consistently rank as a top priority the need to maintain and improve the quality of drinking water supplied by public water systems. Included here is the need to provide assistance to all public water systems to ensure they have the necessary managerial, technical and financial capabilities to comply with Safe Drinking Water Act requirements. Also related to this priority is the need to continue to encourage water systems to implement source water protection activities. Several of our states feel targets under 2.1.1 are unreasonable given the recent new rules. We are aware of a Headquarters Working Group involving the Association of State Drinking Water Administrators is underway and recommendation from this workgroup should be seriously considered.
- Another issue for our states is the limited resources available to meet all the monitoring (and assessment) needs to support strategic measures as well as program activities such as TMDL development, Rotating Basin Strategies, etc. The Strategic Plan could better recognize this issue and the need for prioritization. The recent ('06) addition of a PAM for having assessment information available through the Assessment Data Base (or a compatible system) is a step in right direction. More thought could be given to identifying essential efforts required by a state monitoring/assessment program (such as support of Strategic Plan measures) via the PAMs, and then having Agency resources directed to supporting these efforts.
- For our coastal states, a continuing priority is to address coastal water quality through beach monitoring, but also to address nonpoint source pollution in coastal watersheds. Many of the coastal areas in the Southeast are experiencing rapid development and its effects on water quality. Linkages need to be made at the strategic target and program activity level to better integrate these areas into a comprehensive coastal strategy for the Agency.

- Due to recently litigation, the development of TMDLs, and their subsequent implementation is a priority issue for most of our states. Many of our states would like to use the development of TMDLs as a catalyst for good watershed management, supported by their other programs such as the 319 Nonpoint Source Program. Unfortunately, the current strategic targets under 2.2.1a, b, and Measure L, present some significant challenges to measuring progress. Measure 2.2.1a needs modification to reflect appropriate scale and incremental progress. The 2.2.1 b target, as currently presented, should be eliminated, as we have never identified a consistent methodology for measuring it. There does need to be a way of measuring maintenance and progress. We also need a way of measuring incremental progress under Measure L. The related PAMs also need to be reduced in number and aligned to move us toward achieving the strategic targets under 2.2.1.

Region 5 – Goal 2

State and Tribal Regional Issues/Priorities in regard to the Revision of the U.S. EPA's 2006 – 2011 Strategic Plan

Region 5 Goal 2

How information was gathered

Region 5 sought input from the states in the Region through a direct solicitation to the state members of the Region 5/State Planning Work Group and through program to program contacts between Region 5 program managers and their state counterparts. The Region 5 Water Division solicited state issues/priorities through an email to our state Surface and Ground Water / Drinking Water counterparts. This email explained that this effort was the first step in EPA's process to revise its Strategic Plan. We asked states to identify priorities that rise to the national level so that they could be considered during the Agency's Strategic Plan revision. We also specifically requested the states to consider, and provide input on, their expectations for meeting Measure L and the comments coming out of the PART review. Particularly, we asked the states for suggestions regarding Objectives/Measures/priorities under a new Strategic Plan that support (or hinder) Measure L.

Region 5 sought input from the tribes in the Region through a direct solicitation to the environmental coordinators for each tribe and through discussion in the Regional Tribal Operations Committee.

Description of key state and tribal issues/priorities

Issue: Infrastructure Funding

Impact/relevance to strategic plan: There is a need to emphasize maintenance of existing infrastructure so that investments that have been made to protect water quality are adequately supported and even enhanced. Recent events in the Gulf highlight the need to prioritize this work. Also, cities increasingly will be needing to make investments in stormwater management infrastructure, and national priorities should reflect this need as well as its importance in protecting and restoring waters.

Issue prevalence: This issue would be applicable to most, if not all, Region 5 states.

Issue: Watershed Restoration

Impact/relevance to strategic plan: Current language in the strategic plan is unworkable and makes it difficult to target limited resources in ways that provide

demonstrable results. The idea of targeting efforts to the most important problems and measuring progress in terms of load reduction is supported. By making these changes, watershed protection and restoration efforts will have more meaningful goals to guide them.

Issue prevalence: This issue would be applicable to most, if not all, Region 5 states.

Priority: Technology Based Effluent Limitations

Impact/relevance to strategic plan: EPA needs to be more aggressive in developing and updating the technology based Effluent Limitations. Effluent Guidelines and related technology-based Effluent Limitations represent the first of Congress' basic two-prong water pollution control strategy reflected in the CWA. First, the USEPA is to set technology-based Effluent Guidelines and Effluent Limitations that generally require uniform pollution reduction equal to what is technically and economically achievable by the various classes and categories of industries nationwide. Such technology-based limits must be set regardless of the water quality needs or benefits associated with this level of pollution reduction. Second, the requirement is to evaluate whether additional water quality problems or hazards persist despite the application of such technology-based Effluent Limitations. If so, then there is a need to set additional water quality-based Effluent Limitations to eliminate any water quality problems.

Priority prevalence: This priority is applicable to all Region 5 states.

US EPA REGION 6 - - INPUT ON STATE/TRIBAL ISSUES/PRIORITIES

Goal 2: Clean and Safe Water

1. How information was gathered. Letters were sent to the Directors of R6 State Environmental Agencies requesting their review of the current EPA Strategic Plan and the identification of any new or emerging issues that are not adequately addressed in the current plan. The Director of the Office of Tribal Affairs contacted tribes to ask for the same input. The Texas Commission on Environmental Quality (TCEQ) submitted written comments in response to this request. The Arkansas Department of Environmental Quality (ADEQ) submitted their input to Region 6 during a state program managers meeting in Little Rock on August 31, 2005. Other comments were received from States at the annual Region 6/State Watersheds Planning Workshop held in Dallas each April. The Tribes said that they did not feel that they were given adequate time to provide a meaningful response and declined to provide input. The Tribes have been assured that other opportunities will be available in the future for them to review drafts and provide input.
2. Description of key state issues/priorities.
 - a. Short description of the issues/priorities.
 - i. Sub-Objective 2.1.2 and Strategic Target H—The target should capture all assessed waters rather than relying on a 2002 baseline that doesn't reflect assessments completed since then by States like Texas. Advisories issued by states after 2002 (e.g., mercury) are not captured by this goal, and could result in the strategic target projecting a false sense of accomplishment. (Comment also applies to Strategic Target L, below)
 - ii. Sub-Objective 2.2.1 and Strategic Target L – Drop or redefine 2.2.1 a & b to capture finer scale, incremental, and partial water quality restoration and maintenance activities. Establish more accurate baselines. A scientifically based and reproducible method needs to be developed using available sources of information. Ideally, the method could be enhanced as the ADB (etc.) is further populated and 11 and 14 digit HUCs are available for application.
 - iii. General Issues under Sub-Objective 2.2.1:
 - (1) Indices for biologic integrity should be developed to assess water body impairments.
 - (2) The nine element watershed plans should be more holistic and encompass influxes from all sources (point and non-point).

- (3) Need to develop centralized national guidance that provides effective monitoring and assessment strategies for non-point sources of pollution (with case studies).
 - (4) Ground water quality criteria is not addressed by EPA
- iv. Sub-Objective 2.2.2–This Sub-Objective should be inclusive of multiple agencies involved in wetlands protection (US Army Corps of Engineers, National Oceanic and Atmospheric Administration, etc.). The national strategy to prevent wetlands loss needs retooling or projected trend needs re-estimation to account for the rapid rate of coastal development in the US, other man-made losses, and natural wetlands losses due to hurricanes, land subsidence, and possible sea-level rise.
- b. Potential impact to a specific Agency program or activity and its relevance to the national Strategic Plan. How might this issue/priority translate into a change in the architecture (objectives, sub-objectives, targets)? No impact on architecture anticipated to address comments. Means and strategies?
 - i. Sub-Objective 2.1.2 and strategic target H– Comment seeks to establish a more inclusive baseline measure that considers present and emerging threats to human health and the environment.
 - ii. Sub-Objective 2.2.1 and Strategic Target L - Comments seek to catalogue current watershed water quality status more accurately (current baselines can't be replicated), show results on a finer scale (11 and 14 digit HUCs or using sub-eco-regions), and to report incremental progress and partial restoration efforts. Other general issue comments request EPA to develop indices of biological integrity to assess water body impairments, and ground water quality criteria. EPA should work to develop more effective monitoring and assessment strategies for non-point sources of pollution in a centralized national guidance document that includes case studies. Finally, the nine element watershed plans should be more holistic in addressing all point and non-point sources.
 - iii. Sub-Objective 2.2.2– Comment seeks to be more inclusive of multiple federal and state agencies roles in wetlands protection. Also seeks to distinguish sub-objective's accounting of wetlands loss through anthropomorphic and natural causes.
- c. Prevalence of the issue among the states and/or tribes in the region.
 - Comments on Sub-objective 2.1.2–TCEQ only
 - Comments on Sub-objective 2.2.1 and Strategic Target L– All States in Region 6
 - Comments on General Issues Under Sub-objective 2.2.1–ADEQ
 - Comments on Sub-objective 2.2.2–TCEQ only

Region 7 – Goal 2

REGION 7 STATE/TRIBAL INPUT TO EPA STRATEGIC PLAN

Goal #2.

Source of Input: Region 7 convenes a meeting of the state environmental directors twice yearly. The issue of joint planning & priority setting is always foremost on the agenda. In this way, every six months we verify the continuing validity of existing priorities and general environmental issues that were established in the development of the state PPA (All region 7 states have PPAs & PPGs with both state environmental and agriculture departments). These discussions are also held at the program level annually as regional and state program counterparts negotiate the work plans for PPGs and other discrete environmental grants.

Tribal priorities and concerns are also developed and verified on an ongoing basis. Senior management meets quarterly the ROC, and these meetings are supplemented by monthly conference calls in which all 7 tribes participate. Field visits by regional staff average at least one per month. Planning & priority setting are always part of the visits. In addition, four of the tribes have PPGs and these comprehensive work plan negotiations generate a plethora of information regarding crucial tribal issues.

Finally, on September 20, 2005 Region 7 convened a 90 minute conference call of the Regional Planning Council which included planning representatives of all the states & tribes to discuss specifically this OCFO exercise.

Overarching Concerns About EPA Plan: We began with general comments. IA opened with the comment that the EPA Strategic Plan, 2003-2008, is entirely too long. The others were in agreement that 239 pages is too much. It was proposed that if the current length is required to satisfy GPRA, the OMB and the Congress, then a shorter, more user friendly version might be developed for public consumption and broad management purposes. Most participants felt that the plan was not remotely strategic, but was a five year operating plan.

NE commented that national priorities shouldn't drive regional priorities and cited as an example the absence of blue-green algae (which is a real priority for NE). Another was "small communities." It was observed that the language was present in the plan, but concrete action and projected results were absent. The plan needs to permit the flexible development of local strategies. While they agreed that this is technically possible, the reality seems to be overshadowed by the national emphasis. The general view was that we have what is allegedly a "bottoms up" process but a "top down" product.

MO remarked that the measures were difficult to interpret. Do they represent targets that are aggregated nationally or one target to be met in each state?.

The Tribal rep. remarked that the environmental problems encountered by the tribes were not specifically reflected in the plan. However he said that the National Tribal

Council (NTC) had no specific recommendations at the moment. It was merely an observation.

MO said that we desperately need a unified, simple reporting system so that what we're accomplishing gets recorded. The other states and the tribes heartily agreed. This point came up several times in slightly different contexts. Several states noted that there are too many activity measures (more like an operating plan than a strategic plan). Need to have a few key measures and leave the nitty-gritty to the states. (This relates to the general comment regarding the length of the plan.)

In conclusion, there was a fairly unanimous opinion that the Plan had little relevance for the states & tribes. What counts is the money, and it is difficult to see a clear connection between the plan and the budget. The Agriculture interests in the region also feel that any strategies, but particularly those which feature "Stewardship" (which stresses individual responsibility) demand a greater stress on timely and relevant stakeholder communication regarding regulations and practices.

Specific to Goal 2: MO noted that the measures for the sub-objective on water quality standards stood apart from another set of measures dealing with "swimmable." It would seem that one would be contained within the other. IA observed that non-point source needs to be beefed up due to the ag issues and thought we should work on a strategy that creates linkages with the Farm Bill. Agriculture interests in the region also supported this recommendation, particularly as it relates to non-point source issues. Mo noted that water infrastructure issues don't seem to be reflected in the plan proportionate to the seriousness of the problem. IA noted that a large percentage of their population relies on private wells for drinking water; and 26% of the wells don't meet standards. Tribes also rely heavily on wells for drinking water. Several states voiced a desire to have greater clarity on what is meant by "a watershed approach." The term is used a lot but suffers from a lack of definition. KS observed that determination of which HUCs should be generally used would help. Regional agriculture interests also felt that the plan should more specifically provide for research objectives and strategies that would highlight new technologies that minimize agriculture's impact on the environment. They also felt strongly that the research should cover integrated systems approaches.

Region 8 – Goal 2

Goal 2: Clean and Safe Water

Synthesis of State and Tribal Priorities and Issues --- U.S. EPA, Region 8

1. Information source: Information from states was solicited in a memo from Region 8's State Assistance Program to State Environmental Directors, State Planning Contacts, and State Agriculture Program Directors. Performance Partnership Agreements (PPAs) were also used to collect initial information on state priorities, as well as feedback from a spring 2005 meeting with states and subsequent discussions regarding EPA's water quality outcome measures. Information from tribes was gathered at the Regional Operations Committee's (ROC) Quarterly Meeting.

2. Description of state and tribal issues and priorities:

Monitoring: Effectively monitoring contamination levels in water resources remains a key state priority. Currently, monitoring resources are focused on a broad spectrum of sampling routines for both chemical and biological pollutants and areas most impacted by the surge in energy development, as well as other human impacts. To address monitoring needs, capacity building for a volunteer monitoring program is needed, as well as revisions to the monitoring strategy. All states in the region are tasked with monitoring of their surface water resources and need additional support to achieve monitoring goals. State involvement in a national water assessment does not support state monitoring needs. While the issues of monitoring, permitting (below) and inspections (below) do not impact the Strategic Plan's architecture, the broader issue of energy development's impact on water quality and state resources deserves adequate discussion in Goal 2.

Permitting: Processing the large volume of permits requests due to increase in energy development has become an important state priority. Water quality permits are primarily issued to coalbed methane and oil and gas operations. Difficulties in processing have been exacerbated by the declining federal cost share which makes it difficult to provide adequate compensation packages to recruit and retain quality personnel.

Inspections: Providing effective water quality inspections of permitted facilities is also a state priority. Water quality inspections are primarily conducted at coalbed methane and oil and gas operations. To ease the burden on the inspected entity and the inspecting staff members, the state is sharing inspection tasks between department programs and it is considering EMS certifications, and self audit procedures.

Measuring and Reporting on Water Quality Restoration: States need support developing TMDLs and implementing them in a manner that effectively demonstrates restoration. State and federal law requires effectiveness evaluation of TMDL implementation as part of 319 funding, PAMS, etc. While states are currently

developing programs, there are no specific resources allocated to implementation. This is a broad-scale issue that impacts both inter-state and international water quality issues. The water quality outcome measures in Sub-objective 2.2.1, particularly the watershed restoration Measure A, should be revised to reflect more realistic expectations of environmental improvement, given the capacity and resources states have to achieve and report on these measures.

Water Resources for Tribes: An overarching priority for tribes in the Region 8 is a need for resources to obtain clean and safe water. In particular resources are need for surface and groundwater protection, non-point sources, as well as resources needed to replace aging water infrastructure, and to address Off-Indian Country activity impacts of source and non-point sources/Cross Border issues (i.e., AFO/CAFO, coal bed methane, sewage discharges, mining discharges, among others).

Increase Direct Implementation Presence: It is a priority for tribes that EPA increase its DI presence and tribes' environmental core program capacity. Direct Implementation guidelines need to be re-tailored to allow tribes with the programmatic ability to play an increased hands-on role in compliance matters. Programs such as oil and gas activity should have more Tribal DI presence. It impacts 100% of Tribes in Region 8.

Safe Drinking Water: A key priority for the tribes is for to EPA work in collaboration with other Federal Agencies to provide basic safe drinking water to all citizens. EPA and its partners will need to address water quality issues caused by severe drought conditions, decrease stream flow due to channelization, releases from dams, and generally protecting sources of drinking water from contamination. These issues are not expected to impact the architecture of the plan, but they should be acknowledged in Objective 2.1. This impacts all tribes in Region 8.

Core Water Quality Standards need to be developed and implemented for all tribal waters, either by tribes or federal core water quality standards implemented by EPA. Core standards will protect tribal waters for traditional and cultural uses. This impacts all tribes in Region 8.

Tribal Capacity for Water Sampling: It is a priority among tribes to increase their capacity for large river/waterbody sampling. Tribes must become more involved in watershed groups through the Clean Water Act Section 106 program with other agencies. This impacts all tribes adjacent to the Missouri River in Region 8. It is important to emphasize that when strengthening the water quality standards program, that tribes play a key part of this and deserve attention.

Refinement of state's water use classification system: TMDL development is raising many issues that highlight the need to refine and update the water use classification portion of water quality standards.

CWA Integrated Reporting and database integration: It is the priority of one state to continue the development, integration, and operation and management of a RDBMS integrating the EPA Assessment database (ADB), WQ Standards database, and WQ Standards Attainment database (WARD). All states in the region need to do submit an Integrated Report, suggesting the prevalence of this issue in Region 8. Integrating the myriad of databases involved should be discussed in Goal 2.

New regulations: One state is concerned about keeping up with new regulations throughout all of our environmental programs. It feels the Arsenic and Stage 2 Disinfectants/Disinfection Byproducts (D/DBP) rules could pose significant impacts to Public Water Systems (PWSs) in the state and to our Drinking Water Program.

Declining State Revolving Fund: The stagnant or declining state revolving fund capitalization grants will be detrimental to state and national drinking water and wastewater infrastructure needs.

Geographic Initiatives: It is a priority to develop a comprehensive Red River Basin Watershed Management Plan and address other state flooding issues, including Devils Lake. It is important to manage and protect the Missouri River ecosystems. The revised Strategic Plan should emphasize the need for protection of interior U.S. lakes, rivers and aquatic ecosystems. These deserve as much attention as other geographic initiatives such as the Great Lakes and Chesapeake Bay.

3. Other Cross-Goal Issues:

Building State Capacity: Reductions in federal funding for core programs that are occurring concurrently with increases in the workload required of these delegated programs by EPA, represents a major state issue. States and EPA need to work collaboratively to address federal funding shortfalls for the delivery of environmental programs at the state level. We need to make strides in eliminating duplication and inefficiencies by jointly defining the relative roles, responsibilities, authorities and resources of the state and EPA. This includes jointly and collaboratively redefining regional oversight to ensure that federally authorized programs are conducted adequately with authorization agreements in the most efficient manner.

Standardization of Media Program Databases: As states consolidate their databases into statewide, enterprise-based systems, it becomes more problematic to communicate with EPA's unique databases. Standardization of EPA's databases would facilitate a more fluid exchange of information and bring consistency to the data gathered among programs.

Region 9 – Goal 2

Goal 2 - Clean and Safe Water

Overall Comments:

- o It is critical that BAS/APGs/Organizational Assessment measures are aligned to minimize the reporting burden on regions/states/tribes/Pacific Islands and to ensure that we are measuring environmental results.

For example:

Strategic Target F: Region 9 has requested FY05 state data on Strategic Target F by late October 2005. Region 9 used the July 25, 2005 OGWDW memo: FY2005 Source Water Assessment and Protection Reporting Spreadsheets as guidance which requests completed Source Water Protection (SWP) reporting tables be submitted to HQ by October 31, 2005. While we expect to provide data on Strategic Target F from most of our states, creating an output for this target is extremely difficult given the voluntary nature of the SWP program and the current SWP program development phase that many of our states are currently in. In particular, California does no tracking of SWP activities, so reporting the status/progress of SWP in California is especially problematic.

- o Tribes constitute a high priority in Region 9. Key activities to develop and enhance tribal capacity for this goal and the other four goals (including providing adequate assistance and funds for those tribes seeking program approvals, authorizations, delegations, or Tribal Standards) are included in Goal 5, Objective 3 Build Tribal Capacity.
- o We suggest a modification to the OW architectural structure as a means of improving reporting, ensuring accountability of our core programs as they are supported and implemented by states and tribes resulting in an more easily understood format:

Goal 2 Clean & Safe Water by 2011

I. Sustainable Water/Wastewater Infrastructure for states and tribes

- Overall improvement of access to safe drinking water and basic sanitation (Move Goal 4 Border and Pacific Island infrastructure into Goal 2)

A. % of population served has access to safe drinking water
(States, Tribes, Border communities and Pacific Islands)

B. % of population has access to adequate sanitary systems
(States, Tribes, Border communities and Pacific Islands)

C. SRF and DWSRF - Fund utilization rate

II. Restore Waters of the U.S. to Beneficial Uses

**A. % Waters that have water quality monitoring coverage including
probalistic**

monitoring (Waters on State and Tribal lands)

B. % or numbers of waters (water bodies, stream segments etc) that have achieved beneficial uses (Waters on State and Tribal lands)

**D. Watersheds restoration efforts underway
efforts underway for states and tribes
wetlands acreage restored, protected (move from Goal 4 into Goal 2)**

NPDES permits, tmdls

E. Beaches

F. Shellfish/Fish

G. Source Water

III. State and Tribal Program Implementation

Accountability for the overall funding state, tribes for implementation of the delegated federal water programs.

CWA implementation supported by EPA grant funds

Safe Drinking Water implementation

PERs (state program review) and PART reviews (overall water program reviews)

Text from current Agency Strategic Plan:

Objective 2.1 Protect Human Health

New Input from Region 9, States/Tribes/Pacific Islands:

Priority: Overall, 95% of tribal community water systems conduct appropriate monitoring under the SDWA, thereby addressing violations of monitoring and reporting requirements.

Impact: Could require an additional measure/subobjective in the architecture.

Geographic scope: Tribes

Text from current Agency Strategic Plan:

Subobjective 2.1.1 Water Safe to Drink

By 2008, 95% of the population served by community water systems will receive drinking water that meets all applicable health-based drinking water standards through effective treatment and source water protection.

New Input from Region 9, States/Tribes/Pacific Islands:

Priority: Ensure that individuals served by community water systems, particularly those facing adverse disproportionate impacts, receive drinking water that meets all applicable health-based drinking water standards. Key areas of focus are: arsenic (largely naturally-occurring); perchlorate exposure; and cesspools in Hawaii.

Impact: No architectural change proposed at this time.
Geographic scope: Arizona, California, Hawaii, Nevada

Priority: By 2015, in coordination with other Federal partners, reduce by 50% the number (percentage) of households on Tribal lands lacking access to safe drinking water.

Impact: May require an additional measure/subobjective in the architecture.
Geographic scope: Tribes

Priority: By 2015, in coordination with other Federal partners, reduce by 50% the number of households on Tribal lands lacking access to basic sanitation.

Impact: May require an additional measure/subobjective to the architecture.
Geographic scope: Tribes

Priority: Ensure adequate drinking water for residents in the Pacific Islands where there are increasing challenges to provide adequate water infrastructure.

Impact: Will require an additional measure/subobjective to the architecture.
Geographic scope: Pacific Islands

Text from current Agency Strategic Plan:

Subobjective 2.1.2 Fish and Shellfish Safe to Eat

By 2008, improve the quality of water and sediments to allow increased consumption of fish and shellfish.

New Input from Region 9. States/Tribes/Pacific Islands:

Priority: Improve the quality of water and sediments to allow increased consumption of fish and shellfish, particularly critical for low-income populations, tribal communities, and other groups of people with high consumption of fish and shellfish.

Impact: May require an adjustment to a measure/subobjective in the architecture.

Geographic scope: Regionwide

Text from current Agency Strategic Plan:

Subobjective 2.1.3 Water Safe for Swimming

By 2008, restore water quality to allow swimming in not less than 5% of the stream miles and lake acres identified by states in 2000 as having water quality unsafe for swimming.

New Input from Region 9, States/Tribes/Pacific Islands:

Priority: Restore water quality to coastal beaches. Reduce beach pollution from sanitary overflows and stormwater.

Impact: May not require change in architecture.

Geographic scope: California, Hawaii, Pacific Islands

Text from current Agency Strategic Plan:

Subobjective 2.2.1 Improve Water Quality on a Watershed Basis

By 2008, use both pollution prevention and restoration approaches so that:

- In 600 of the Nation's watersheds, water quality standards are met in at least 80% of the assessed water segments.
- In 200 watersheds, all assessed water segments maintain their quality, and at least 20% show improvement above 2002 conditions.

New Input from Region 9, States/Tribes/Pacific Islands:

Priority: Improve water quality on a watershed basis throughout the Region. Promote watershed partnerships and approaches to restore waters via regulatory tools and voluntary methods. Redefine watershed subobjective to be more indicative of overall progress towards restoration. Assess adverse and disproportionate impacts on communities to support critical improvements to infrastructure. SRF percentage allocations should

be modified to ensure those communities with adverse impacts receive adequate allocations, perhaps making the percentage allocation comparable to what small states receive. For the Border areas, increased BEIF funding could be used to leverage other sources of funding.

We support the concept of a watershed subobjective that reflects our efforts to improve water quality. However, the current measure 2.2.1(a) as currently defined is not as useful as a target measure. We are involved with the subobjective workgroup, the watershed manager's forum on identifying new measures that may better reflect overall efforts. (See 10/6/05 Specific Regional comments to OW.)

Impact: Probably no change needed in the architecture.

Geographic scope: Arizona, California, Hawaii, Nevada, Tribes, Pacific Islands

Priority: By 2011, 95% of waters in Indian country will be covered by approved water quality standards, including Clean Water Act Section 303/401 TAS, federally promulgated standards, tribally-approved, or when appropriate, state- and tribally-approved.

Impact: Probably will require an additional measure/subobjective in the architecture.

Geographic scope: Tribes

Priority: By 2011, 95% of waters in Indian country will provide monitoring data pursuant to Clean Water Act Section 106 program guidance.

Impact: Probably will require an additional measure/subobjective in the architecture.

Geographic scope: Tribes

Region 10 – Goal 2

State and Tribal Comments from R10 on Goal 2: Clean and Safe Water

Monitoring: The Environmental Monitoring and Assessment Program (EMAP) should reflect the fact that Alaska occupies 20% of the nation's land base, 40% of the nation's surface water, more than half the nation's coastline and contains half of the nation's wetlands. The federal coastal conditions report on the health of the nation's waters cannot be complete without data from Alaska.

Suggested modification to the NSP: (1) EPA's 2006 Strategic Plan needs to targets completion of "baseline conditions" of the nation's waters by prioritizing baseline and ongoing water quality monitoring in Alaska; (2) The funding for this program should reflect the need for establishing initial baselines and monitoring environmental conditions in the State of Alaska and should be proportional to the land and water under Alaska's jurisdiction; and (3) Science objective supporting Clean and Safe Water should focus on groundwater monitoring protocol for extremely cold climates, where thaw and run-off can have severe impacts on monitoring.

Comment provided by: State of Alaska and Native Village of Savoonga

Greater Recognition of Regional Variability and Need to Address Regional Issues: There needs to be a greater recognition on EPA's part of the importance of state and regional initiatives and their measures. For example, in Idaho, recovery of bull trout and salmonid species are prime environmental objectives. Rather than focus solely on broad national measures, such as watershed improvements based on 8 digit HUCs, there should be a way for the national program to credit more regionally targeted work. A lot of watershed or species recovery work takes a long time to show progress. Those who understand the inputs into a waterbody could see improvements in sediment control, lowering of nutrients, etc. While it may take some time to meet a goal, on a local level, you can see whether the data are trending towards that goal long before the goal is achieved. The national goals may be too broad a measure for much of this work. There needs to be a way that real environmental improvement on a local level can be acknowledged and credited on the national level.

Suggested modification to the NSP: EPA needs to recognize regional priorities and provide environmental measures that reflect that watershed and species recovery may take time.

Comment provided by: State of Idaho

Modify wetlands protection policy: The current Wetlands protection policy needs to recognize that the Clean Water Act has specific jurisdiction over certain wetlands and that other wetlands are managed solely under State of Alaska law. In the spring of 2003, the EPA and the Corp of Engineers issued an Advance Notice of Proposed Rulemaking to make clear the CWA jurisdiction over wetlands and other waters. In November of 2003, the agencies suspended this

rulemaking. The Governor of the State of Alaska has requested that EPA complete this rulemaking effort clarifying when federal jurisdiction may or may not be claimed. The “no net loss of wetlands” strategy needs to be modified to recognize this jurisdiction issue. In addition the strategic plan should recognize the need for funding a program to protect and manage wetlands in Alaska under the State Programmatic General Permit (SPGP) Program.

Suggested modification to the NSP: EPA should clarify jurisdictional issues over wetlands in its wetlands protection policy, and commit to funding a program to protect and manage wetlands in Alaska.

Comment provided by: State of Alaska

TMDL Implementation: Need greater focus on implementation of Total Maximum Daily Loads (TMDLs). EPA and states need to work together to develop a more holistic implementation strategy that goes beyond EPA’s limited regulatory tools and grant authority to bring more stakeholders and funding agencies to the table. We are compiling an inventory of implementation techniques that are being used in the four Region 10 states. We will also identify and compile the list of issues that states are encountering as they implement TMDLs or take steps to encourage nonpoint sources to implement already established BMPs. Coordination, outreach and continued discussion are key.

Suggested modification to NSP: National Strategic Plan should acknowledge that this is an emerging priority for Region 10.

Comment provided by: From the joint state-EPA work currently being funded by the ECOS grant. Partners consist of all four states in Region 10 and the EPA regional office.

NPDES Permit and Compliance Program: As the State of Alaska heads towards primacy of the NPDES permit and compliance program, our concern over the current EPA backlog of NPDES permits increases. The Draft Regional Commitments document includes a target for state-issued NPDES permits to be current (75%), but does not include a target for permits issued by EPA in non-primacy states. Taking on the NPDES program from the EPA is an enormous undertaking and in order for the State of Alaska to be successful, the state cannot inherit a huge permit backlog at the beginning of the program implementation.

Suggested modification to NSP: EPA strategic plan should include catching up on the existing permit backlog in delegated or non-delegated states where EPA implements the program.

Comment provided by: State of Alaska

Ineffective Measure: “Waterbodies identified in 2000 as not attaining water quality standards are fully attained.” The perceived improvement in water quality based on this measure is more an artifact of the methodology for extracting this data from Oregon’s 303(d) list than a true achievement of improvements over the past year. Additionally, we see two main problems with the measure: 1) given the widespread temperature problems in Oregon, and the long-term nature of the

resolution of this, and other nonpoint source pollution problems, improvements cannot be shown in near term; 2) while we may make progress on some pollution problems within a waterbody, this measure sets the overreaching goal of meeting ALL water quality standards.

Suggested modification to NSP: Revise measure to incorporate adaptive management concepts. EPA could establish a series of submeasures that track various stages of adaptive management. Example: Stage 1 - assessment (TMDL or other analysis); Stage 2 – Development of water quality improvement plan (or watershed restoration plan); Stage 3 – Quantitative measure of progress which could include surrogates (such as miles of restored riparian habitat or other quantitative measure of BMP implementation); Stage 4 – measureable water quality improvement; Stage 5 – Achievement of standard.

Comment provided by: State of Oregon.

Underground Injection Control measures: (SDW-12a, SDW-12b, SDW-12d: “Percentage of Class I / II / V wells identified in significant violation that are addressed by the UIC program”) Oregon has been voicing concerns to both Region 10 and Headquarters about these measures since they were first proposed over a year ago, but have not seen anything change. The terms “significant” and “addressed” are inadequately defined, and the performance measures imply that the state should undertake a full inventory of UICs. A better use of the state’s very scarce resources for this program would be a more strategic, risk-based approach to managing UIC’s throughout the state.

Suggested modification to the NSP: Modify measures used to assess UIC program effectiveness. Promote a strategic, risk-based approach to managing UIC’s throughout the state/ nation.

Comment provided by: State of Oregon

Need to Align Measures among States, Tribes, Locals and EPA: Inherent in EPA’s stated desire for greater alignment, joint planning, and coordination is the need for many jurisdictions to share similar measurements and use them to adaptively manage their programs. Idaho is moving away from the traditional bean counting to focus on performance and efficiency measures. EPA should consider the following measurements for water: (1) Percentage of stream miles meeting water quality standards and beneficial uses; (2) Percentage reduction of nitrate levels in all monitoring wells exceeding the groundwater quality standard within nitrate priority areas that have completed management plans; (3) Percentage of funded watershed projects finished on time and within budget, (4) Percentage of sanitary survey inspection reports returned to a facility within 30 days.

Suggested modification to the NSP: Consider incorporating these measures into the NSP.

Comment provided by: State of Idaho

How Information Was Gathered: In July, information on this exercise was presented at the Regional Tribal Operations Committee Meeting. In August, the Acting Regional Administrator sent letters to all the Directors of the State Environmental Programs and all Tribal Leaders requesting input on EPA's National Strategic Plan. Additionally, Region 10 GAP-grant coordinators transmitted similar requests to their tribal contacts. In September, this exercise was discussed at the Pacific Northwest Directors meeting that includes all the Directors of the State Agencies, Region 10's Regional Administrator and Director of the environmental programs for the Province of British Columbia and representatives from Environment Canada.